

**EXHIBIT A**

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re

JAB Energy Solutions II, LLC<sup>1</sup>

Debtor.

Chapter 11

Case No. 21-11226 (CTG)

Re: D.I. \_\_\_\_

**ORDER REGARDING TURNKEY OFFSHORE PROJECT SERVICES, LLC'S AND  
OFFSHORE TECHNICAL SOLUTIONS, LLC'S MOTION FOR RELIEF FROM THE  
AUTOMATIC STAY**

Upon the Cross-Motion<sup>2</sup> of TOPS and OTS for an order granting relief from the automatic stay to proceed with the EDLA Proceeding in the EDLA District Court and it appearing that the district court has jurisdiction under 28 U.S.C. § 1334, which was referred to this Court under 28 U.S.C. § 157; and it appearing that venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that due and proper notice of the Cross-Motion has been given; and it appearing that the relief requested in the Cross-Motion is proper pursuant to section 362 of the Bankruptcy Code; and after due deliberation, and sufficient cause appearing therefor; it is ORDERED:

1. The Cross-Motion is GRANTED.
2. TOPS and OTS are granted relief from the stay to reopen the EDLA Proceeding against the Debtor.
3. The 14-day stay under Federal Rule of Bankruptcy Procedure 4001(a)(3) is waived and this Order shall become effective immediately upon entry.

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<sup>1</sup> The last four digits of the Debtor's U.S. tax identification number are 3625. The Debtor's mailing address is 19221 I-45 South, Ste. 324, Shenandoah, TX 77385

<sup>2</sup> Capitalized terms used herein shall have the meanings ascribed to them in the Objection and Cross-Motion.

4. The Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.